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Counsel to Plaintiff RDC Liquidating Trust

## UNITED STATES BANKRUPTCY COURT WESTERN DISTRICT OF NEW YORK

In re: Chapter 11

ROCHESTER DRUG CO-OPERATIVE, INC. Case No. 20-20230 (PRW)

Debtor.

Advisory Trust Group, LLC, as trustee of the RDC LIQUIDATING TRUST,

Plaintiff,

٧.

MYLAN SPECIALTY, L.P.,

Defendant.

Adv. Proc. No. 2-22-02068 (PRW)

## THIRD STIPULATION EXTENDING TIME TO ANSWER COMPLAINT

Plaintiff, RDC Liquidating Trust, through its trustee Advisory Trust Group, LLC ("Plaintiff" or the "RDC Liquidating Trust"), successor in interest to Rochester Drug Co-Operative, Inc., and defendant, Mylan Specialty L.P. ("Defendant", and together with Plaintiff, the "Parties"), by and through their undersigned attorneys, hereby stipulate and agree as follows:

WHEREAS, on February 3, 2022, Plaintiff filed a complaint (the "Complaint") against

Defendant;

WHEREAS, the summons (the "Summons") was issued on February 4, 2022;

WHEREAS, on February 4, 2022, Defendant was served with the Summons and Complaint;

and

WHEREAS, on February 25, 2022, the Parties entered into a stipulation (the "First

Stipulation") by which the time required for Defendant to answer the Complaint was extended

through and including April 15, 2022. The First Stipulation was approved by order entered

February 28, 2022.

WHEREAS, on April 7, 2022, the parties entered into a stipulation (the "Second

Stipulation") by which the time required for Defendant to answer the Complaint was further

extended through and including June 15, 2022. The Second Stipulation was approved by order

entered April 8, 2022.

The Parties hereby stipulate and agree to the matters set forth below:

1. The Parties continue to negotiate and exchange information and have agreed, subject

to Court approval, to further extend the time for the Defendant to answer the Complaint to and

including August 31, 2022.

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2. All other terms set forth in the First Stipulation and Second Stipulation remain in full	
force and effect.	
Respectfully submitted,	
Dated: June 2, 2022	Dated: June <u>2</u> , 2022
PACHULSKI STANG ZIEHL & JONES LLP  /s/ Ilan D. Scharf  Bradford J. Sandler (NY Bar No. 4499877)  Ilan D. Scharf (NY Bar No. 4042107)  Jason S. Pomerantz (CA Bar No. 157216)  780 Third Avenue, 34th Floor  New York, NY 10017  Telephone: (212) 561-7700  Email: bsandler@pszjlaw.com	CLARK HILL  William C. Price (Pa. I.D. No. 90871)  Samuel A. Hornak (Pa I.D. No. 312360)  One Oxford Centre  301 Grant Street, 14 <sup>th</sup> Floor  Pittsburgh, PA 15219  Telephone: (412) 394-2565  Email: wprice@clarkhill.com  shornak@clarkhill.com  Counsel to Defendant Mylan Specialty L P
SO ORDERED:	
DATED:, 2022 Rochester, New York	HON. PAUL R. WARREN United States Bankruptcy Judge